

July 21, 2022

By ECF

Hon. Paul G. Gardephe United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>Denson v. Donald J. Trump for President, Inc.</u>, No. 20 Civ. 4737 (S.D.N.Y.) Joint Request for Extension Regarding Class Certification Discovery

Dear Judge Gardephe:

We represent Lead Plaintiff Jessica Denson and the putative plaintiff class in the above-captioned matter, and we file this letter jointly with counsel for defendant Donald J. Trump for President, Inc. (the "Campaign"). Plaintiff and the Campaign have met and conferred, and jointly and respectfully request the following brief extension of the discovery dates endorsed by the Court on April 14, 2022.

- 1) Completion of fact discovery to be extended from July 29, 2022 to August 31, 2022.
- 2) Completion of depositions to be extended July 29, 2022 to August 31, 2022.

All other dates and agreements in the Court's endorsed schedule dated April 14, 2022 shall continue to apply. This is the first request for an extension of the above dates.

Counsel for both parties appreciate the Court's attention to these matters.

Respectfully submitted,

David K. Bowles

Bowles & Johnson PLLC

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

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Dated: July 25, 2022